

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
CROWN CLOTHING CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 05-10049 (NG)
	)	
RANDCORE, INC.,	)	
RAND INTERNATIONAL TRADING,	)	
INC., ANDRE BERNARD, AND	)	
RONALD BERNARD,	)	
	)	
Defendants.	)	
_____	)	

**JOINT MOTION TO AMEND REVISED JOINT STATEMENT AND PRETRIAL  
SCHEDULE TO EXTEND THE CURRENT DEADLINE FOR COMPLETION OF  
FACT DISCOVERY FROM JANUARY 31, 2007 TO FEBRUARY 16, 2007**

In support of this Motion, plaintiff Crown Clothing Corporation (“Crown Clothing”) and remaining defendant Ronald Bernard, constituting all of the remaining parties to this action, hereby state that on October 25, 2006 this Court approved a Stipulation and Revised Joint Statement and Pretrial Schedule which contained a discovery cut-off date of December 29, 2006. On December 18, 2006, this Court approved a Joint Motion to extend the discovery cut-off to January 31, 2007 upon the parties’ representation that the plaintiff Crown Clothing and the three original defendants in this action against whom judgment has previously been entered were in negotiations which, if successful, would result in the dismissal of this action. Since that time, counsel for Crown Clothing and counsel for those three original defendants have reached agreement on the substance and language of a settlement, which Crown’s counsel has been informed is under review by advisors to those three former defendants. In the unlikely event that that settlement cannot be consummated, the remaining parties believe

that the remaining discovery, which has been deferred so that the parties can pursue the settlement, can be completed within two weeks.

WHEREFORE, the parties jointly request that the date for completion of fact discovery in paragraph A.1 of the Stipulation and Revised Joint Statement and Pretrial Schedule be extended to February 16, 2007 and all of the other dates set forth in the Stipulation and Revised Joint Statement and Pretrial Schedule approved by the Court on October 25, 2006 remain the same.

/s/ John C. Wyman

John C. Wyman (BBO #535620)  
Ryan M. MacDonald (BBO #654688)  
Murtha Cullina LLP  
99 High Street, 20<sup>th</sup> Floor  
Boston, Massachusetts 02110  
(617) 457-4000  
jcwyma@murthalaw.com  
rmacdonald@murthalaw.com

*Attorneys for Plaintiff  
Crown Clothing Corporation*

/s/ James M. Vant

Gary R. Greenberg (BBO #209420)  
Annapoorni R. Sankaran (BBO #631065)  
James M. Vant (BBO #653616)  
Greenberg Traurig, LLP  
One International Place, 20th Floor  
Boston, Massachusetts 02110  
(617) 310-6000  
greenbergg@gtlaw.com  
sankarana@gtlaw.com  
vantj@gtlaw.com

*Attorneys for Defendant Ronald Bernard*

Dated: January 26, 2007